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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Thirteenth session,
Geneva, 7-17 July 1997,
agenda item (3 (d))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Criteria for inclusion of Viscous Flammable liquids in Packing Group III UN Chapter 5.6 (b)

Transmitted by the European Confederation of Paint, Printing Ink and Artist's Colours Manufacturers Associations (CEPE)

Introduction

The CEPE paper R600 proposed a change to Chapter 5.6 (b) to bring the criteria for allowing certain flammable liquids with a flash point of less than 23°C to be included in Packing Group III. Unfortunately, during discussions, there was a misunderstanding and the wording was changed from that originally proposed, at a time when CEPE were not present. The wording adopted completely changes the meaning of the clause and causes severe problems for industry.

Justification

The adopted wording, "The mixture cannot contain any substance with a primary or a subsidiary risk of division 6.1 or 8", results in industry not being able to use substances, *at any level of concentration*, in its products, if they have either a primary, or subsidiary risk of 6.1 or 8.

The original meaning of the clause was that the mixture itself should not contain more than 5% of Class 6.1 or 8 materials or be toxic or corrosive itself. The intention of R600 was to ensure that the classification process was based on the hazardous properties of the mixture, not its components. This is a principle fundamental to the classification of preparations and is accepted worldwide. It is a basic tenet of the global harmonisation programme.

CEPE would therefore proposes that the clause 5.6(b) is amended to align with the principle of classification of mixtures and preparations on the basis of their inherent hazards.

Proposal

Replace 5.6(b) with:

"The mixture does not have a Class 6.1 or Class 8 subsidiary risk;"